



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

September 8, 1997

Mr. Don Bruce
Chief, Response Section II
Emergency Response Branch
U.S. Environmental Protection Agency
77 West Jackson Street
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



237099

Dear Mr. Bruce,

As a follow-up our telephone conversation on Wednesday, September 3, 1997, I am writing to request that the Region 5 offices of the United States Environmental Protection Agency consider the assignment of an On-Scene Coordinator to the Celotex site located in Wilmington, Illinois.

Celotex began operations in the late 1950's near the Kankakee River. Celotex operated a 40+ acre dump just north of the facility. This dump area has been the focus of previous CERCLA investigations. Celotex ceased operations in the early 1980's. Previous inspections by the IEPA have revealed numerous drums of unmarked/unknown material. The current owner has failed to identify these materials or dispose of them properly. Several of these drums have been observed to be leaking and contain an oily substance. The site is currently accessible by the local community. Attached are several excerpts from a local newspaper regarding the Celotex facility.

For this particular project, Mark Wagner (217/524-1662) will be the Illinois EPA contact person. Thank you for your consideration and we look forward to working with USEPA in these and future removal activities.

Sincerely,

Bruce Everetts
Illinois Environmental Protection Agency
Bureau of Land
Remedial Project Management Section
Site Assessment Unit

bcc: Mark Wagner

Celotex: let's clear *and*

10 p
5/14/97 *Wilmington Free Press*
 The time has come for Wilmington to say it will not tolerate an industrial



Editor's note: This is the first in a four part series aimed at finding a way to have deteriorating industrial property cleaned up. Future installments will feature a history of the plant, environmental concerns and possible funding solutions to clean up and rejuvenate the area.

By Pam Monson
 Free Press reporter

Residents of Wilmington, and not even those who drive past the dilapidated, deteriorating site on a daily basis, know how the former Celotex plant and say it should be leveled.

"It's falling apart," "They

should get rid of it" and "Fix it up or tear it down" are common comments regarding the old shingle factory, where production ended 17 years ago next month, following an employee strike. The building has been vacant most of the time since, with an occasional shipping company operating briefly at the site.

Nestled virtually in the heart of the city, the roughly six-acre industrial wasteland would probably get the vote for Wilmington's biggest eyesore, now that the old bank building at the downtown int'l section is gone.

The condition of the complex shows a lack of respect for the community, and although Wilmington deserves better, Wilmington will not have better unless the community takes the initiative to push improvement.

Broken windows, red effluent spilling into Forked Creek, coverless manholes, litter, shingle scraps and overgrown weeds characterize the property. Piles of half-buried asphalt shingles fence the south bank of Forked Creek. An integral part of Wilmington's history, but of questionable value as a legacy for future generations.

"Something's got to get done with it. It's a dangerous building," said Mayor Bill Wendling, who said he is still trying to catch up with paperwork and sealine in to his position and didn't have a plan to pursue the property.

Two-and-a-half years ago, Richard Reich, an environmental protection specialist with the Illinois Environmental Protection Agency (IEPA), inspected the Celotex plant and cited the property owner for apparent open dumping of waste and for not determining

See CELOTEX PLANT page 2

Continued



at it up
steland in the center of town



A WALK along the Chicago Street side of the former Celotex plant provides evidence of the building's continued deterioration.

Celotex plant, continued from the Free Press front page

whether waste in barrels inside the plant was solid, special or hazardous in nature. The owner, Ron Cruze, of Hendersonville, TN, had 15 days to respond.

If Cruze failed to respond, he faced fines of up to \$25,000 per day. Reich is no longer with the IEPA Maywood office and no representative of the IEPA responded Monday to inquiries about the outcome of the citations.

City officials would like to see something done with the former Celotex property, but fear the environmental cleanup costs. The

council flatly refused to consider Cruze's offer last August to sell it for as little as \$150,000, or cleaned up for \$275,000.

The offer was only for the production plant site. Celotex still owns approximately 40 acres of on-site landfill north of Forked Creek.

Three options are immediately available to the city. The council could seek condemnation, an action that would create massive problems associated with taking title to the land, particularly responsibility for the cost of environmental clean up.

Demolition of the buildings is

a problem if there is no method of compensation, the likely situation in this case.

At the very least, city officials could seek an injunction to enforce the city's codes and ordinances and correct distinct hazards.

Some course of action is a step in a positive direction. The city is in the midst of its own clean up campaign, and should expect like effort from the owners of run-down properties like Celotex.

To be continued next week.

Send

Celotex: Hazards

5/28/97 *Wilmington Free Press*

Editor's note: This is the third in a series of articles concerning the abandoned Celotex plant in Wilmington. Final installment will be published next week.

by Pam Monson
Free Press reporter

Broken glass, graffiti and bits and pieces of shingles are much

more than an affront to the visual senses. They are indicators of environmental concerns and evidence the old paper mill buildings on Kentwood and Chicago streets are frequented by teens looking for mischief, even to the degree of gang activity.

Two years ago, while breaking up a teen gang's meeting place, Wilmington police were confronted with possible hazardous wastes and

safety issues inside the buildings.

Upon discovering the condition of the interior of the plant, with partially-covered, seven-foot holes dotting the concrete floor, it became policy of the police department to not enter the buildings at night. The risk to the officers was greater than the non-urgent concerns that drew them to the mill property.

At the same time, the Illinois Environmental Protection Agency was called to inspect wastes found at the plant.

Environmental Protection Specialist Richard Reich cited the property owner, Ron Cruse, of Hendersonville, TN, for not determining the type of waste found in leaking barrels and for apparent open dumping or abandonment of waste.

According to Cliff Gould, IEPA regional manager of land pollution control, Reich recommended a follow-up inspection to see if Cruse had corrected the problem.

Gould noted the follow up inspection was never performed and the IEPA will do a follow up inspection in June, taking appropriate action based on its findings.

The agency will be starting anew with possible enforcement actions at the former Celotex property, and violation corrections could be guided under new or old legislation.

In the past, when a property owner was cited for violations of the Environmental Protection Act, the IEPA determined what corrective measures it wanted taken and



PROPERTY OWNER Ron Cruse, of Hendersonville, TN, was cited by the Illinois Environmental Protection Agency two years ago for not determining the type of waste in these leaking barrels, and for apparent dumping. This photo was taken during the inspection in November, 1994.

Free Press file photo

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Land

in our back yard

the owner had to comply or be fined. Enforcement in the case of the paper mill fell through the cracks of the system.

According to Gould, enforcement actions changed last year, with new deadlines on each step of the

process. The IEPA now has 180 days after identifying a violation to notify the land owner with a written notice of the violation and the corrective action the agency wants taken.

The owner, who had 15 days to

respond in the past, has 45 days to enter a written response or request a meeting. A written remediation plan must be accepted, rejected or modified by the IEPA within 21 days, otherwise, it is considered a plan

See CELOTEX, page 2



MOUNTAINS OF asphalt, cooled long ago when production ended, are comprised of some of the worst of what the paper mill put into the ground, petroleum-based waste.

Photo by Pam Monson

Continued

Celotex, continued from the Free Press front page

for compliance.

If there is no response from the property owner, the issue is forwarded to the enforcement decision group in Springfield, an action leading to enforcement by the state's attorney's office.

Under legislation that has been the IEPA's guidance for the last two years, Title 17, Section 58 of the Environmental Protection Act, a tiered approach to cleanup objectives (EACO) gives much more flexibility in clean up actions.

The IEPA can require a property to be cleaned to acceptable levels, use site specific information to change the clean up objective or consider an alternative to risk analysis to arrive at a clean up objective.

Gould explained that engineering controls could be applied to the latter two objectives. If a developer proposed a parking lot on the mill property, the IEPA would consider not removing petroleum-based special wastes from the ground when asphalt, a similar petroleum-based material, will be placed over the top of it and there will be no further chance of contamination from the ground waste.

In addition, the levels of contaminants remaining after nearly 20 years and their ability to leach into groundwater are considered in clean up requirements. Gould didn't think leachate from the buried shingles would filter through the soil, but petroleum from the asphalt would.

The IEPA could restrict a property's use according to the degree of clean up. The Celotex property, in its current state would not be suitable for a park or residential uses, but may pass as a light industrial site.

Recent legislation also relieves new owners of the obligation to clean up an environmentally compromised site if the purchaser has not contributed to the problem.

Hazards of a more local nature, the building's vulnerability to fire, has members of the Wilmington Fire Protection District in deep

thought.

"We just don't know what's in there anymore, if it's just a steel structure, that's no problem. If there's anything else in there, we don't know what it is or what it will generate when it burns," said Fire Chief Randy Black.

During the years the mill was in operation, Black said the department battled fires in the shingle dump every summer. Sometimes the wastes were ignited, sometimes they just went up on their own. After Celotex covered the dumping grounds with soil, the fires ceased.

Black said materials like asphalt produce toxic fumes when they burn. Fumes would be hazardous to firefighters and any residents that may have to be evacuated as the fumes were carried into Northcrest by prevailing southwest winds.

In recent years, the buildings have served as a warehousing and distribution center. City Hall has no current registration from any business operating out of the mill property and no knowledge of commercial activities occurring

there, including what may be stored inside.

The mill's water system was cut off from the city's supply long ago, and the fire department would not trust its integrity.

A hydrant at the corner of Water and Chicago streets and two on North Kankakee Street, at Chicago Street and near Forked Creek, would have to supply water for a firefight. The mill race and river could also be counted as water sources, but proximity to a burning section of building could make at least the Water Street hydrant and the river unavailable.

The fire department's course of action in the event of a fire is under discussion.

The city's ordinance enforcement program can be called upon to see that the complex's appearance is improved, including the removal of trees, brush, litter and debris; as well as force correction of safety violations including sealing a coverless manhole near Chicago Street. Those measures would be a start.



HAZARDS TO person are typical of an abandoned industrial site. This open manhole is just a few feet off of the intersection of Water and Chicago streets.
Photo by Pam Monson